Our ref: HA/2019/121609/02-L01
Your ref: AWDM/1398/19

Date: 16 October 2019

Adur & Worthing Councils
Development Control
Portland House Richmond Road
Worthing
West Sussex
BN11 1LF

Dear Sir/Madam

FRA SUBMITTED - CHANGE OF USE OF THE JETTY TO ENABLE RESIDENTIAL OCCUPANCY OF THE 2NO. EXISTING BOATS MOORED EITHER SIDE OF THE JETTY. (MOORINGS REAR OF 5 RIVERSIDE ROAD) SUSSEX YACHT CLUB BOAT HOUSE LOWER BEACH ROAD SHOREHAM-BY-SEA WEST SUSSEX

Thank you for the consultation on the above application, please quote our reference on all correspondence.

We have reviewed the information as submitted and have the following comments.

Environment Agency Position
In the absence of an acceptable flood risk assessment (FRA) we maintain our objection to this application and recommend that planning permission is refused.

Reason(s)
The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Demonstrate that both the occupants and the craft would be safe in the event of a flood
- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event

In particular, the owner/occupier should sign up with the Environment Agency Flood Warning system, and an evacuation plan made to the satisfaction of the Council's emergency planners, should be made available to the occupier to ensure safe access and egress routes to non-flooded areas are available in case, for example, power or

water supplies are lost which will make the houseboat no longer safe or habitable.

Furthermore it has to be noted that a flood gate operated by the Environment Agency is located in close proximity to the site. The gate requires to be operated on certain tide levels and its closure will impact the safe access and egress of the houseboats in this location.

Overcoming our objection
To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Planning Liaison Officer named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Please do not hesitate to contact me on the number below should you have any queries on the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250
Direct e-mail planningSSD@environment-agency.gov.uk

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